

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

| | | |
|------------------------------------|---|------------------------|
| IN RE: |) | Case No.: 17-21704-CMB |
| |) | |
| Kevin G. Mickens |) | Chapter 13 |
| Debtor |) | |
| |) | Doc. No.: |
| Kevin G. Mickens |) | |
| Movant |) | Claim No.: 2 |
| |) | |
| v. |) | |
| |) | |
| PNC Bank, National Association and |) | |
| Ronda J. Winnecour, Trustee |) | |
| Respondent |) | |

DECLARATION

I, Albert G. Reese Jr., Esquire, attorney for the above-referenced Debtor, hereby submit this formal written Declaration that the existing Chapter 13 Plan is sufficient to fund the plan with the modified debt for the following reason:

Pursuant to PNC Bank, National Association's Notice of Mortgage Payment Change dated May 6, 2024, the Debtor's current escrow payment for account number ending in **5606** is **\$491.71**. The new escrow payment is **\$540.91**. The new total mortgage payment is **\$898.74** effective June 1, 2024. The Debtor will pay the escrow shortage in addition to his regular monthly Chapter 13 plan payment.

Dated: **May 7, 2024**

Respectfully submitted by:

/s/ Kevin G. Mickens

Kevin G. Mickens

Dated: **May 7, 2024**

Respectfully submitted by:

/s/ Albert G. Reese, Jr., Esquire

Albert G. Reese, Jr., Esquire

Attorney for Debtor

PA ID #93813

640 Rodi Road, 2nd Floor, Suite 2

Pittsburgh, PA 15235

(412) 241-1697

(412) 241-1687(fax)

areese8897@aol.com